

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MELODY M. MARTINEZ

Plaintiff

v.

NEVIN WARNER, et al.,

Defendants

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: CIVIL ACTION
:
: NO. 07-3213 - GP
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MOTION FOR VOLUNTARY DISMISSAL

AND NOW COMES Plaintiff Melody M. Martinez (“Plaintiff”) and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), respectfully moves this court for a dismissal of any and all claims asserted against all Defendants in the above captioned matter. In support of said motion, Plaintiff declares that:

1. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.
2. Plaintiff and Defendants signed and attached stipulations in support of this motion.
3. Plaintiff and Defendants agree the claims are to be dismissed with prejudice.

TRIQUETRA LAW

Dated: November 24, 2008

By: s/Sharon R./ López
Sharon R. López
PA Bar Number: 70605
Attorneys for Plaintiff
The Offices at Marion Court
35 E. Orange Street, Suite 301
Lancaster, PA 17602
Dated: November 23, 2008

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MELODY M. MARTINEZ

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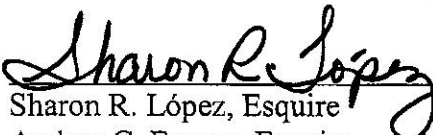
NEVIN WARNER, et al.,
Defendants

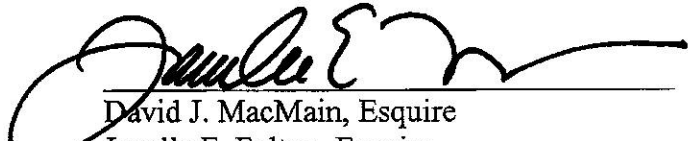
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: JURY TRIAL DEMANDED

STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lancaster County, Nevin Warner, Joseph Schauren, James Hansberry, the Lancaster County Prison Board, and Warden Vincent Guarini with prejudice. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24th day of November, 2008.


Sharon R. López, Esquire
Andrea C. Farney, Esquire
TRIQUETRA LAW
The Offices at Marion Court
35 East Orange Street, Suite 301
Lancaster, PA 17602
Attorney for Plaintiff


David J. MacMain, Esquire
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Attorney for the Lancaster County Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MELODY M. MARTINEZ

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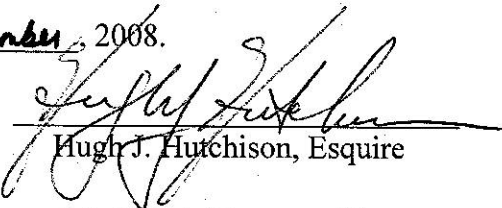
STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lebanon County, Defendant Chief Sally Barry, Supervisor Rich Worley, and Probation Officer Jamie Dishong. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24th day of November, 2008.


Sharon R. López, Esquire
Andrea C. Farney, Esquire

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Lancaster, PA 17602
Attorney for Plaintiff


Hugh J. Hutchison, Esquire

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Attorney for Lebanon County and
Lebanon County Defendants

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Plaintiff

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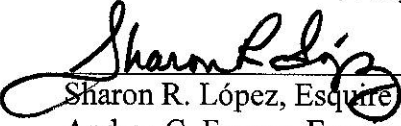
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STIPULATION OF DISMISSAL OF DEFENDANTS WITH PREJUDICE

AND NOW COMES Plaintiff Melody M. Martinez ("Plaintiff") and, pursuant to the provisions of Federal Rule of Civil Procedure 41 (a), hereby stipulates to the dismissal of any and all claims asserted against Lebanon City, Defendant Chief William Harvey, Officer Rissinger, and Sgt. Bord. Plaintiff and Defendants agree that each shall bear their own respective costs and fees.

SO AGREED, this 24th day of November, 2008.


Sharon R. López, Esquire
Andrea C. Farney, Esquire
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City Defendants